



November 30, 2012

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

The National Association of Hispanic Journalists (NAHJ) is troubled that the Federal Communications Commission is currently considering relaxing our nation's cross-ownership rules without first addressing the impact of any rule change on broadcast ownership by women and people of color.

We are troubled that the FCC plans to lift the newspaper-TV cross-ownership ban in our nation's largest markets even though a federal court warned the commission last year to study the effect of any rule change on broadcast ownership by people of color and women before adopting any new regulations.

We are also frustrated that the FCC has failed to listen to the numerous organizations of color who have called on the commission, for years to adopt policies to increase ownership diversity rather than promoting greater media consolidation which has made it harder for women and people of color to own broadcast stations.

NAHJ has been among the groups calling on the commission to address the woeful state of broadcast ownership by people of color. According to the latest FCC figures, people of color own just 3.6 percent of all full-power TV stations and 8 percent of all full-power radio stations despite making up close to 40 percent of the U.S. population.

Increasing the number of people of color who own broadcast stations is critical to increasing the number of journalists of color working in our nation's newsroom and to improving the quality of news coverage of our community.

In addition, we oppose media consolidation because it results in more journalists being laid off. And too often, journalist of color are the first since they are the last hired.

NAHJ's voice has played a crucial role in this ownership proceeding. Our letter to the NTIA in 2006, asking the agency whether it planned to update its minority ownership studies, lead to the discovery by Free Press that the commission's ownership data was inaccurate.

Civil rights and public interest groups questioned how the commission could adopt policies to allow for greater media consolidation when it didn't have accurate data to properly assess the impact of any rule change on broadcast ownership by women and people of color.

We are grateful that the commission has since tried to correct this problem and released new ownership figures. But that's not enough. The commission needs to use this data to examine the impact of any rule change on ownership diversity. And like many groups, we been calling on the commission for a long time to adopt policies to increase ownership diversity.

Here is a brief history of NAHJ comments in the media ownership proceeding:

- In 2003, NAHJ submitted comments to the FCC expressing its concern about the commission's plan to rewrite the ownership rules without first considering the impact of these changes on communities of color, minority ownership and on the journalism profession.
- The NAHJ board passing a resolution in February 2003 calling on the FCC to postpone issuing new ownership regulations until the commission held a series of public hearings nationwide that allowed for the maximum possible public input into the agency's deliberations.
- The NAHJ board passed a resolution in June 2005 that stated: "The National Association of Hispanic Journalists, in supporting a diversity of viewpoints and increased minority ownership of print and broadcast media outlets, opposes further deregulation of broadcast ownership by the FCC. We believe weakening those ownership rules threatens opportunities for minority owners and restricts a meaningful diversity of viewpoints. We cannot support changes in the rules unless those issues are adequately addressed. "
- In 2006, NAHJ sent a letter to U.S. Department of Commerce Secretary Carlos Gutierrez inquiring why the National Telecommunications and Information Agency had not conducted a minority ownership study since 2000. The agency had released several reports over the previous decade but had not updated the report during the Bush Administration.
- NTIA acting assistant secretary, John M.R. Kneuer, responded to NAHJ's letter saying the agency had no plans to conduct another study. He suggested that NAHJ examine the ownership reports filed annually by the FCC and review the data on minority ownership. NAHJ issued a statement saying it was disappointed that the agency had not conducted another study and that it was concern the FCC was going to consider changing the ownership rules without having the latest information on the current state of minority ownership.



- The public interest group Free Press conducted its own study after learning of NTIA's response to NAHJ's letter. The group found Free Press the FCC's ownership data was inaccurate.
- The NAHJ board passed a motion during its October 2006 board meeting that strengthened its opposition to media consolidation. The motion stated: "The National Association of Hispanic Journalists, in supporting a diversity of viewpoints and increased minority ownership of print and broadcast media outlets, opposes further deregulation of broadcast ownership by the FCC. We believe, as it has been documented in recent research, weakening those ownership rules threatens opportunities for minority owners and restricts a meaningful diversity of viewpoints."
- NAHJ co-sponsored a town hall meeting in New York City on Oct. 19, 2006, featuring FCC commissioners Michael Copps and Jonathan Adelstein that focused on the future of diversity in the media industry. More than 400 people attended to voice their opposition to media consolidation.
- The NAHJ Board of Directors unanimously approved a resolution that also calls on the FCC to refrain from issuing new broadcast ownership rules until the work of the task force is complete and minority ownership opportunities are addressed. NAHJ also joined other national groups in a letter to the FCC calling on the commission to create the task force and address ownership diversity before moving forward with any rule changes.
- NAHJ opposed the Comcast – NBC Universal merger in 2011 because of the impact of the merger on diversity, including on broadcast ownership by people of color.
- NAHJ joined a letter with 50 organizations calling on the commission to adopt policies to increase broadcast ownership by women and people of color. The groups also called on the FCC to consider the impact of any rule change on ownership diversity before adopting new policies.

We now submit this letter into the docket. And we, once again, call on the FCC to examine the impact of any rule change on the diversity of broadcast ownership and to take proactive steps to increase the number of stations owned by women and people of color.

Sincerely,

Hugo Balta  
President, NAHJ

cc: Commissioners Robert McDowell, Mignon Clyburn, Jessica Rosenworcel, and Ajit Pai